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District Counsel for Tulare Local Healthcare District

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-44

Chapter 9

Date: September 13, 2018
Time: 9:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

**DECLARATION OF SANFORD HASKINS IN SUPPORT OF MOTION FOR ORDER
AUTHORIZING REJECTION OF CERTAIN EXECUTORY CONTRACTS (GUPTA-
KUMAR MEDICAL PRACTICE ASSOCIATES, INC., PARUL GUPTA, M.D.)**

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1 I, Sanford Haskins, hereby declare and represent as follows:

2 1. My name is Sanford Haskins. I am the interim Chief Administrative Officer
3 of Tulare Local Healthcare District, dba Tulare Regional Medical Center ("Debtor" or the
4 "District").

5 2. I make this Declaration in support of the District's Motion for Order
6 Authorizing Rejection of Certain Executory Contracts (Gupta-Kumar Medical Practice
7 Associates, Inc., Parul Gupta, M.D.)("Motion").

8 3. I have personal knowledge of the facts contained herein, except for those
9 stated on information and belief, and as to those matters I believe them to be true.

10 4. The District filed this Chapter 9 case on September 30, 2018 ("Petition
11 Date").

12 5. The District is a California healthcare district located in Western Tulare
13 County.

14 6. In my business judgment on behalf of the District, I have determined that
15 the contracts that are the subject of this Motion ("Designated Contracts"¹) are no longer
16 be needed in the District's business as a result of the pending transaction with Adventist
17 Health and therefore provide no benefit to the District and should be rejected.

18 7. A list of the Designated Contracts is attached hereto as Exhibit "A" and
19 specifies the following information as to each of the Designated Contracts: the (1)
20 contract party, (2) the date of the contract; and (3) a description of the subject contract.

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27 ¹ Designated Contracts include four (4) service agreements. While the District recognizes that the Designated
28 Contracts may not constitute "executory contracts" within the meaning of 11 U.S.C. § 365, the District wishes to reject
the Designated Contracts nonetheless out of an abundance of caution and for the avoidance of any doubt.

1 8. I am over the age of eighteen and if I were called as a witness in
2 connection with these proceedings I would and could testify as set out in this
3 Declaration.

4 I declare under penalty of perjury, under the laws of the United States of
5 America, that the foregoing is true and correct.

6 Executed this 15th day of August, 2018, at Portland, OR.

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Sanford Haskins